

Title V

Model General Permit Template

FACILITY-WIDE UMBRELLA

Template # SJV-UM-0-1

For All Facilities Applying For A Title V Permit

This template is designed to streamline the Title V permitting process by addressing the facility-wide requirements for facilities required to obtain a Title V permit. Applicants for Title V permits choosing to use this template will only have to complete the enclosed template qualification form and submit it with their Title V application.

San Joaquin Valley Unified Air Pollution Control District

FINAL
Title V Model General Permit Template
Facility-Wide Umbrella Template

Template No: SJV-UM-0-1

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FINAL DECISION DATE:

4/28/2000

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

TITLE V GENERAL PERMIT UMBRELLA TEMPLATE

ENGINEERING EVALUATION

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I. Purpose

The purpose of this template is to identify those federally enforceable requirements that apply to all facilities subject to Title V, and to simplify the application process by addressing the general requirements that apply to the facility and to any permitted or unpermitted activity at the facility.

II. Template Applicability

This template is designed to be used by all facilities subject to the requirements of Title V. Conditions are used to ensure compliance with applicable requirements covered by this template. The permit conditions contained in this template will be incorporated into the Title V permit of any facility choosing to make use of this template.

The Template Qualification Form (TQF) is attached as Appendix A. A completed and signed TQF must be submitted with the Title V application.

III. Applicable Requirements

Facilities may be subject to both federally-enforceable requirements as well as District-only requirements. Federally-enforceable requirements will be enforceable by EPA and the public through Title V permit conditions identified as “Federally Enforceable”. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. The final Title V permit issued by the District will contain both federally enforceable and District-only requirements.

This template does not address source specific requirements. Requirements addressed by this template are those which apply universally to all Title V sources. This template does not address compliance with all federally enforceable requirements. Generally, requirements not addressed by this template are those that require a source specific analysis, or are covered by other templates. The applicable requirements addressed in this template are in Table 1, Applicable Requirements.

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Table 1. Applicable Requirements

Rule/Regulation	Citation	Description
SJVUAPCD Reg. I	1100	Equipment Breakdown
SJVUAPCD Reg. I	1160	Emission Statements
SJVUAPCD Reg. II	2010	Permits Required
SJVUAPCD Reg. II	2020	Exemptions
SJVUAPCD Reg. II	2031	Transfer of Permits
SJVUAPCD Reg. II	2040	Applications
SJVUAPCD Reg. II	2070	Standards for Granting Applications
SJVUAPCD Reg. II	2080	Conditional Approval
SJVUAPCD Reg. II	2520, Sections 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0	Federally Mandated Operating Permits
SJVUAPCD Reg. IV	4101	Visible Emissions
SJVUAPCD Reg. IV	4601	Architectural Coatings
SJVUAPCD Reg. VIII	8020 ¹ , 8030 ¹ , 8060 ¹	Fugitive Dust (PM ₁₀) Emissions
40 CFR Part 82	Subpart F	Stratospheric Ozone
40 CFR Part 61	Subpart M	National Emission Standard for Asbestos

1. If not SIP approved, these requirements will not be federally enforceable.

IV. Compliance

This section contains a discussion of how compliance is assured with each requirement addressed in this template.

District Rule 1100

Sections 6.0 and 7.0 set forth breakdown procedures and reporting requirements. These requirements are addressed by template permit conditions #1, #2 and #11. District Rule 1100 has been submitted to the EPA to replace each of the following county rules in the SIP: rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); 111 (Kern, Tulare, Kings). District Rule 1100 is at least as stringent as the county SIP rules addressing breakdowns, as demonstrated in Table 2.

By using this template the applicant is requesting a permit shield from the requirements of County rule 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); 111 (Kern, Tulare, Kings). See permit shield condition #38.

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Table 2. Comparison of District Rule 1100 to County Rules

REQUIREMENTS	District Rule 1100	Rule 109 (Merced) Rule 110 (S.J.)	Rule 111 (Kern, Tulare, Kings)	Madera Rule 113	Rule 110 (Fresno, Stanislaus)
A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.	X	X	X (Kern allows 2 hrs)	X	X
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	X	X	X	X	X
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes:	X	X	X	X	X
1) A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.	X	X	X	X	X
2) A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	X	X	X	X	X
3) A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future.	X	X	X	X	
4) Pictures of the equipment or controls which failed if available.	X	X	X	X	

District Rule 1160

Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emission statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NOx) from that source. The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the Air Resources Board (ARB) with an emission inventory of sources emitting greater than 10 tons per year of NOx or ROGs based on the use of emission factors acceptable to the ARB. See permit condition #3.

District Rules 2010 and 2020

District Rule 2010 sections 3.0 and 4.0 require any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in advance. The ATC will

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remain in effect until the Permit to Operate (PTO) is granted. These requirements are stated in template permit condition #4.

District Rule 2020 lists equipment, which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. These requirements are stated in template permit condition #4.

District Rule 2020 has been submitted to the EPA to replace each of the SIP approved county rules: Rule 202 (in all eight counties in the San Joaquin Valley). District Rule 2020 is as stringent as the corresponding county SIP rules, as demonstrated in Table 3.

Table 3. Comparison of District Rule 2020 to Rule 202 (all eight counties)

REQUIREMENTS	District Rule 2020	Rule 202 (all 8 counties)
An ATC or PTO is not required for listed exempt equipment.	X	X
Conditions are stated under which listed exempt equipment will require an ATC or PTO.	X	
Record keeping is required to verify and maintain exemption, when the exemption is based on a maximum daily limitation.	X	
A compliance schedule is stated for equipment which loses exemption from permitting, necessitating submission of a PTO application.	X	

District Rules 2031, 2070 and 2080

These rules set forth requirements to comply with all conditions of the Permit to Operate. Permits to Operate or Authorities to Construct are not transferable unless a new application is filed with and approved by the District. All source operations must be constructed and operated as specified in the Authority to Construct. See permit conditions #5 and #6.

District Rule 2040

Section 3.0 requires that every application for a permit shall be filed in a manner and form prescribed by the District. See permit condition #7.

District Rule 2520

Section 5.2 requires that permittees submit applications for Title V permit renewal at least six months prior to permit expiration. Permit condition #36 assures compliance with this requirement.

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit:

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Sections 9.5.1 and 9.5.2 contains requirements to incorporate all applicable recordkeeping requirements into the Title V permit, specific records of any required monitoring, and the retention of all required monitoring data and support information for five years. The requirements to keep specific monitoring records and retain records for five years are stated in template permit conditions #8 and #9, respectively.

Section 9.6 contains requirements for the submittal of reports of monitoring at least every six months and prompt reporting of deviations from permitting requirements, including those attributable to upset conditions. The responsible official must certify all required reports. These requirements are stated in template permit conditions #10 and #11.

Section 9.8 states that the Title V permit must also contain a severability clause in case of a court challenge; the severability clause is stated in template permit condition # 12.

Section 9.9 contains requirements for provisions in the Title V permit stating 1) that the permittee must comply with all permit conditions; 2) that the permitted activity would have to be reduced to comply with the permit conditions should not be a defense in an enforcement action, 3) that the permit may be revoked, modified, reissued, or reopened for cause, 4) that the Title V permit does not reflect any property rights, and 5) that the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit. Compliance with these sections of Rule 2520 will be assured by permit conditions #5 and #13 - #16.

Section 9.10 contains the requirement to provide in the permit that the permittee pay annual permit fees and applicable fees from District Rules 3010, 3030, 3050, 3080, 3090, 3110, and 3120. This requirement is stated in template condition #17.

Section 9.14.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA shall contain a certification by a responsible official to truth, accuracy, and completeness. Compliance with this section will be assured by permit condition #28.

Section 9.14.2 contains inspection and entry requirements that allows an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements. Compliance with this section will be assured by permit conditions #18, #19, #20 and #21.

Section 9.17 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or

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more frequently as required by the applicable requirement or the District). Condition #35 assures compliance with this requirement.

Section 10.0 requires any application form, report, or compliance certification submitted pursuant to these regulations shall contain certification of truth accuracy, and completeness by a responsible official. Compliance with this section will be assured by permit condition #28.

District Rule 4101

District Rule 4101 has been submitted to the EPA to replace SIP approved Rule 401 (all counties of the SJVUAPCD). EPA made a preliminary determination that District Rule 4101 is “more stringent” than the county versions previously referenced, per correspondence dated August 20, 1996.

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer’s view to a degree equal to or greater than 20% opacity. This requirement is stated in facility-wide template permit condition #22.

District Rule 4601

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than 250 grams of VOC/liter of coating (less water and exempt compounds). Also, the Tables of Standards (section 5.2) limits the use of Specialty Coatings to a VOC content not to exceed the specified limits in Table 1 and Table 2 of Rule 4601. This rule further specifies labeling requirements, coatings thinning recommendations, storage requirements and cleanup requirements. See conditions #23, #24, #25, #26 and #27.

District Rule 4002 - National Emissions Standards for Asbestos - 40 CFR Part 61.145, 61.150

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures. Compliance is assured for these requirements by template permit condition #34.

Title VI of the CAA - Stratospheric Ozone

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in template permit conditions # 29 and #30.

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SJVUAPCD Regulation VIII - Fugitive Dust (PM10)

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources: construction, demolition, excavation, extraction, and water mining activities; outdoor storage piles; paved and unpaved roads. Compliance with these regulations will be required by permit conditions #31, #32 and #33.

V. Permit Shield

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Title V permit is considered compliance with all applicable requirements upon which those conditions are based.

District Rule 1100, 6.1 and 7.0

Compliance with these requirements was addressed in Section IV of this document, and is assured by conditions #1 and #2. Therefore, a permit shield is being granted for these requirements in condition #39.

District Rule 2010, 3.0 and 4.0

Compliance with these requirements was addressed in Section IV of this document, and is assured by condition #4. Therefore, a permit shield is being granted for these requirements in condition #39.

District Rule 2031; 2070, 7.0; and 2080

Compliance with these requirements was addressed in Section IV of this document, and is assured by conditions #5 and #6. Therefore, a permit shield is being granted for these requirements in condition #39.

District Rule 2040

Compliance with these requirements was addressed in Section IV of this document, and is assured by condition #7. Therefore, a permit shield is being granted for these requirements in condition #39.

District Rule 4101

Compliance with these requirements was addressed in Section IV of this document, and is assured by condition #22. Therefore, a permit shield is being granted for these requirements in condition #39.

District Rule 4601, 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2

Compliance with these requirements was addressed in Section IV of this document, and is assured by conditions #23, #24, #25, #26, and #27. Therefore, a permit shield is being granted for these requirements in condition #39.

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District Rule 8020, 8030, and 8060

Compliance with these requirements was addressed in Section IV of this document, and is assured by conditions #31, #32, and #33. Therefore, a permit shield is being granted for these requirements in condition #39.

County APCD Rules

Where current District rules assure compliance with comparable county rules that are part of the SIP, a permit shield is granted in template permit condition #38.

VI. Permit Conditions

These permit conditions will be incorporated into the Title V permit of any facility choosing to make use of this Umbrella Template:

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)]
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)]
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0]
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020. [District Rule 2010, 3.0 and 4.0; and 2020]
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit

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noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1]

6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031]

7. Every application for a permit required under Rule 2010 (Permits Required) shall be filed in a manner and form prescribed by the District. [District Rule 2040]

8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.5.1]

9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.5.2]

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.6.1]

11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520. [District Rules 2520, 9.6.2 and 1100, 7.0]

12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.8]

13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.9.1]

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14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.9.3]

15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.9.4]

16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.9.5]

17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.10]

18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.14.2.1]

19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.14.2.2]

20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.14.2.3]

21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.14.2.4]

22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101, by using EPA method 9. If the

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equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)]

23. No person shall supply, sell, solicit or apply any architectural coating, except specialty coatings, that contains more than 250 grams of VOC per liter of coating (less water and exempt compounds, and excluding any colorant added to tint bases), or manufacture, blend, or repackage such coating with more than 250 grams of VOC per liter (less water and exempt compounds, and excluding any colorant added to tint bases) for use within the District. [District Rule 4601, 5.1]

24. Specialty Coating Limitations: No person shall apply, sell, solicit, or offer for sale any architectural coating listed in the Tables of Standards (District Rule 4601, Table 1 and Table 2), nor manufacture, blend, or repackage such coating for use within the District, which contains VOCs in excess of the specified limits after the corresponding date listed in Table 1 (grams of VOC per liter of coating as applied less water and exempt compounds, excluding any colorant added to tint bases) and in Table 2 (grams of VOC per liter of material), except as provided in Section 5.3 of Rule 4601. [District Rule 4601, 5.2]

25. All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired. [District Rule 4601, 5.4]

26. A person shall not use VOCs for the cleanup of spray equipment unless equipment for collection of the cleaning compounds and minimizing its evaporation to the atmosphere is used. [District Rule 4601, 5.5]

27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.2. [District Rule 4601, 6.1 and 6.2]

28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.14.1 and 10.0]

29. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F]

30. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air

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Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart F. [40 CFR Part 82, Subpart F]

31. Disturbances of soil related to any construction, demolition, excavation, extraction, or water mining activities shall comply with the requirements for fugitive dust control in SJVUAPCD District Rule 8020 unless specifically exempted under section 4 of Rule 8020. [District Rule 8020]

32. Outdoor handling and storage of any bulk material which emits dust shall comply with the requirements of SJVUAPCD Rule 8030, unless specifically exempted under section 4 of Rule 8030. [District Rule 8030]

33. Any paved road over 3 miles in length, and any unpaved roads over half a mile in length, constructed after October 10, 1993 shall use the design criteria and dust control measures of, and comply with the administrative requirements of, SJVUAPCD Rule 8060 unless specifically exempted under section 4 of Rule 8060. [District Rule 8060]

34. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M]

35. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.17]

36. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2]

37. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1]

38. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera,

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Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2]

39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (12/17/92); 4601, sections 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2 (9/17/97); 8020 (4/25/96); 8030 (4/25/96); 8060 (4/25/96); A permit shield is granted from these requirements. [District Rule 2520, 13.2]

APPENDIX A

EPA COMMENTS / DISTRICT RESPONSE FOR TEMPLATE # SJV-UM-0-1

EPA COMMENTS / DISTRICT RESPONSE

EPA's verbal comment regarding this template reiterates a previous comment for the proposed operating permit for Chevron's Kettleman Compressor Station (District facility S-1394) and is encapsulated below followed by the District's response. A copy of EPA's February 18, 1998 letter is available at the District office.

1. **EPA COMMENT**

....condition 38 of the facility wide requirements grants a permit shield for SIP rules based more recent District regulations....District should provide a demonstration to show that District Rules assure compliance with the SIP rules they replace....

DISTRICT RESPONSE

Condition 38 of the facility wide requirements grants a permit shield for SIP rules and is being revised to read as follows:

38. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2]

The following stringency analyses are provided in response to this comment and will be included in the umbrella template evaluation:

1. District Rule 1100

Sections 6.0 and 7.0 set forth breakdown procedures and reporting requirements. These requirements are addressed in the facility wide requirements as conditions 1, 2 and 11. District Rule 1100 has been submitted to the EPA to replace each of the following county rules in the SIP: 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); 111 (Kern, Tulare, Kings). District Rule 1100 is at least as stringent as the county SIP rules addressing breakdowns, as demonstrated in Table 1.

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Table 1 - Comparison of District Rule 1100 to County Rules

REQUIREMENTS	District Rule 1100	Rule 109 (Merced) Rule 110 (S.J.)	Rule 111 (Kern, Tulare, Kings)	Madera Rule 113	Rule 110 (Fresno, Stanislaus)
A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.	X	X	X (Kern allows 2 hrs)	X	X
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	X	X	X	X	X
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes:	X	X	X	X	X
1) A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.	X	X	X	X	X
2) A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	X	X	X	X	X
3) A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future.	X	X	X	X	
4) Pictures of the equipment or controls which failed if available.	X	X	X	X	

2. District Rules 2020

District Rule 2020 lists equipment, which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. These requirements are stated in template permit condition #4.

District Rule 2020 has been submitted to the EPA to replace each of the SIP approved county rules: Rule 202 (in all eight counties in the San Joaquin Valley). District Rule 2020 is as stringent as the corresponding county SIP rules, as demonstrated in Table 2.

Template SJV-UM-0-1

Table 2 - Comparison of District Rule 2020 to Rule 202 (all eight counties)

REQUIREMENTS	District Rule 2020	Rule 202 (all 8 counties)
An ATC or PTO is not required for listed exempt equipment.	X	X
Conditions are stated under which listed exempt equipment will require an ATC or PTO.	X	
Record keeping is required to verify and maintain exemption, when the exemption is based on a maximum daily limitation.	X	
A compliance schedule is stated for equipment which loses exemption from permitting, necessitating submission of a PTO application.	X	

3. District Rule 4101

EPA issued a relative stringency finding, dated August 20, 1996, stating that District Rule 4101 is more stringent than SIP approved Kern County Rule 401.

Section 5.0 of the rule prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart or is of an opacity greater than 20%. This requirement is stated in condition 22 of the facility wide requirements.

The preceding discussion provided relative stringency demonstrations for all subsumed county SIP rules. Therefore, the shield as stated in condition 38 is appropriate.

APPENDIX B

TEMPLATE QUALIFICATION FORM
FOR
TEMPLATE # SJV-UM-0-1

Title V General Permit Template Qualification Form
for
Facility-wide Umbrella General Permit Template

District facility ID # _____

To use this template, remove this sheet and attach to application. The conditions outlined in this template will be placed on your Title V permit.

Any facility may use this facility-wide template as part of its Title V application.
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Based on information and belief formed after reasonable inquiry: 1) the information on this form is true and correct and 2) the facility certifies compliance with this template's permit conditions.

Signature of Responsible Official

Date

Name of Responsible Official (Please Print)